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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff.

Vs.

DANIEL JAMES BARNES,

Defendant.

**SECOND SUPERSEDING  
 CRIMINAL INDICTMENT**

2:13-cr-00423-JCM-GWF

**VIOLATIONS:**

*Conspiracy to Commit Sex Trafficking  
 of a Child*, 18 U.S.C. §1591(a)(1),(b)(2),  
 (c), and 1594(c)  
*Sex Trafficking of a Child*, 18 U.S.C. §1591  
 (a)(2), and (b)(2)  
*Transportation of a Minor for Prostitution*,  
 18 U.S.C. §2423(a) and (e)  
*Conspiracy to Commit Sexual Exploitation  
 of a Child*, 18 U.S.C. § 2251(a) and (e)

**THE GRAND JURY CHARGES THAT:**

**Count One**

**CONSPIRACY TO COMMIT SEX TRAFFICKING OF A CHILD**

From in or about April 2013 to in or about August 2013, within the State and Federal  
 District of Nevada and elsewhere,

**DANIEL JAMES BARNES,**

defendant herein, conspired, confederated and agreed with others known and unknown to the  
 Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any  
 means, and benefited financially from participation in a venture which recruited, enticed,

1 harbored, transported, provided, obtained and maintained by any means, in and affecting  
 2 interstate commerce, girls, including but not limited to "J.M.", who had not attained the age of  
 3 18 years, and having had a reasonable opportunity to observe the girls, and knowing and in  
 4 reckless disregard of the fact that the girls had not attained the age of 18 years, and would be  
 5 caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections  
 6 1591(a), (b)(2) and (c), and 1594(c).

7 **Count Two**  
 8 ***SEX TRAFFICKING OF A CHILD***

9 From in or about April 2013 to in or about May 2013, within the State and Federal  
 10 District of Nevada and elsewhere,

11 **DANIEL JAMES BARNES,**

12 defendant herein, knowingly recruited, enticed, harbored, transported, provided, obtained, and  
 13 maintained by any means, and benefited financially from participation in a venture which  
 14 recruited, enticed, harbored, transported, provided, obtained and maintained by any means, in  
 15 and affecting interstate commerce, "J.M." who had not attained the age of 18 years, and having  
 16 had a reasonable opportunity to observe "J.M.," and knowing and in reckless disregard of the  
 17 fact that "J.M." had not attained the age of 18 years, and would be caused to engage in a  
 18 commercial sex act. in violation of Title 18, United States Code, Sections 1591(a), (b)(2) and (c).

19 **Count Three**  
 20 ***TRANSPORTATION OF A MINOR FOR PROSTITUTION***

21 From in or about April 2013 to in or about May 2013, within the State and Federal  
 22 District of Nevada and elsewhere,

23 **DANIEL JAMES BARNES,**

24 defendant herein, did knowingly transport an individual, that is "J.M.," a minor, who had not  
 attained the age of 18 years, in interstate commerce from in or about Clark County, Nevada, to

1 California, and elsewhere, with the intent that such individual engage in prostitution, in violation  
2 of Title 18, United States Code, Sections 2423(a).

3 **Count Four**  
4 ***CONSPIRACY TO COMMIT SEXUAL EXPLOITATION OF A CHILD***  
5 ***(Production of Child Pornography)***

6 From in or about April 2013 to in or about May 2013, within the State and Federal  
7 District of Nevada, and elsewhere,

8 **DANIEL JAMES BARNES,**

9 defendant herein, did conspire, confederate and agree with others known and unknown to the  
10 Grand Jury, to knowingly employ, use, persuade, induce, entice and coerce a minor, "J.M.," to  
11 engage in sexually explicit conduct for the purpose of producing any visual depiction of such  
12 conduct, knowing and having reason to know that such visual depiction would be transported  
13 and transmitted using any means and facility of interstate and foreign commerce, and using  
14 materials that have been mailed, shipped, and transported in and affecting interstate and foreign  
15 commerce by any means, including by computer, in violation of Title 18, United States Code,  
16 Section 2251(a) and (e).

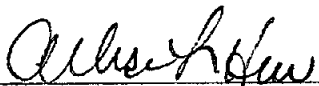
17 **DATED:** this 10<sup>th</sup> day of February, 2016.

18 **A TRUE BILL:**

19 /S/

20 FOREPERSON OF THE GRAND JURY

21 DANIEL G. BOGDEN  
22 United States Attorney

23 

24 ALLISON L. HERR  
Special Assistant United States Attorney